

IN THE SUPREME COURT OF THE STATE OF NEVADA

HAMZA ZALYAUL,
Appellant,

v.

THE STATE OF NEVADA,
Respondent.

Electronically Filed
Jan 18 2022 03:10 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

CASE NO: 83334

MOTION FOR ENLARGEMENT OF TIME

COMES NOW the State of Nevada, by STEVEN B. WOLFSON, Clark County District Attorney, through his Deputy District Attorney, JOHN AFSHAR, and moves this Court for an enlargement of time within which to file Respondent's Answering Brief. This Motion is based on the following memorandum, declaration of counsel, and all papers and pleadings on file herein.

Dated this 18th day of January 2022.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY /s/ John Afshar
JOHN AFSHAR
Deputy District Attorney
Nevada Bar #14408
Office of the Clark County District Attorney

MEMORANDUM

I, JOHN AFSHAR, am a duly licensed attorney in the State of Nevada and am employed by the Clark County District Attorney's Office.

Respondent's Answering Brief is currently due January 19, 2022. This is a Direct Appeal of a Judgment of Conviction following plea of guilty. This Court may extend time to file a Respondent's Answering Brief upon a showing of good cause. NRAP 31(b)(3).

The State herein makes its first request for an enlargement of time. The State requests thirty (30) days within which to file State's Answering Brief. The Deputy District Attorney that negotiated this case in the District Court below are still reviewing the completed draft that addresses several issues including a particularly involved issue regarding whether the District Court has Subject Matter Jurisdiction over an Appellant who committed a crime at 14 years old and was not arrested until he was 21 years old. This extension is necessary so that the negotiating Deputy District Attorney has the required time to adequately review the record and the completed draft to ensure no information was missed. Additionally, both appellate secretaries responsible for filing answering briefs are out of the office. If granted, the new filing date for the State's Answering Brief would be on February 19, 2022. This motion is made in good faith and not for the purposes of undue delay.

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Dated this 19th day of January 2022.

Respectfully submitted,

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY /s/ John Afshar

JOHN AFSHAR
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CERTIFICATE OF SERVICE

I hereby certify and affirm that this document was filed electronically with the Nevada Supreme Court on January 18, 2022. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

AARON D. FORD
Nevada Attorney General

KELSEY BERNSTEIN, ESQ.
Counsel for Appellant

JOHN AFSHAR
Deputy District Attorney

BY /s/ Alexander Chen

Chief Deputy District Attorney,
Clark County District Attorney's Office